

**William X Nietzsche
Julie Metcalf Kinney
c/o 4406 N Mississippi Avenue
Portland, Oregon [97217]
503-287-6494**

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

FILED 30 APR '19 16:24 USDC-ORP

**William X Nietzsche (solely as trustee for
KRME International Trust),**

Et al.,

3:18-CV-01930-SI

Plaintiff/Petitioner,

Case No.

**PLAINTIFF'S MOTION FOR
DEFAULT JUDGMENT AGAINST
STATE OF OREGON CORPORATION
(PURSUANT TO FRCP RULE 55)**

v.

FREEDOM MORTGAGE CORPORATION (FMC),

Et al.,

Defendant(s)/Respondent(s)

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

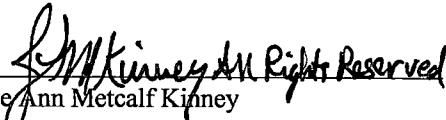
Plaintiff William and Julie Kinney ("The Kinney's"), by and through their son/trustee William X Nietzsche, hereby moves this Court of Record to enter an order for Default Judgment against defendant State of Oregon Corporation, stating in support:

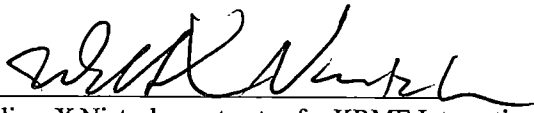
1. On April 5, 2019, defendant State of Oregon Corporation received a copy of plaintiff's First Amended Verified Complaint.
2. Defendant State of Oregon Corporation had 21 days to file a response to the summons and Verified Complaint.
3. As of this date defendant State of Oregon Corporation has failed to file any response to the First Amended Verified Complaint.
4. The Return of Service affidavit signed by Darnell Tellis is in the file showing date of service of plaintiff's summons and First Amended Verified Complaint served upon defendant State of Oregon Corporation.

5. The interest of justice and of the orderly administration of this court should result in entry of Default Judgment against defendant State of Oregon Corporation forthwith.

WHEREFORE, Plaintiffs move this Honorable Court of Record to enter an order for Default Judgment against defendant State of Oregon Corporation.

RESPECTFULLY DATED this 30 day of April, 2019.

By 
Julie Ann Metcalf Kinney
In Solo Proprio, In Proper Persona,
Sui Heredes, Sui Juris [Pro se]

By 
William X Nietzsche, as trustee for KRME International Trust
In Solo Proprio, In Proper Persona,
Sui Heredes, Sui Juris [Pro se]